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July 21, 2022

VIA E-MAIL: BETTY.J.GOLDENTYER@USDA.GOV

Dr. Elizabeth Goldentyer
Deputy Administrator
USDA, APHIS
Animal Care

Re: Sugriva Co LLC Application for USDA Class C License

Dear Dr. Goldentyer:

I have been retained by Sugriva Co LLC (“Sugriva” or “the company”) to assist in obtaining Sugriva’s USDA Class C license. It has come to my attention that in processing the application, Dr. Carla Thomas recently had a discussion with China York, the Director of Sugriva, about the company’s ownership structure. While Ms. York is devoted full time to animal care, she does not necessarily know all the details of the upcoming sale transaction or the details of legal matters pertaining to it. We, of course, want to make sure that the USDA has accurate information about Sugriva and the details of the transaction.

So that there is no confusion, we want to make it absolutely clear that Bhagavan (Doc) Antle will have no ownership or leadership role in operating Sugriva Co LLC. He will not serve on a board or direct the activities of the organization. He will have no interest in Sugriva’s USDA license. Ms. York is the sole owner of the LLC and she will lead the company.

While Sugriva and its attorneys have been preparing for the sale transaction, no sale has taken place. We are specifically awaiting a USDA Class C license before the sale transaction can take place.

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Additionally, as there is uncertainty about Mr. Antle's future plans, there has been no decision made as to whether he can or will be hired to work in some capacity at Myrtle Beach Safari.

We want to make sure that the USDA has timely and accurate information about Sugriva and the sale transaction. Going forward, it would be most efficient if calls to discuss the ownership structure or the sale transaction are directed to me and, if necessary, I can make Ms. York personally available for additional questions.

Finally, with respect to scheduling the pre-license inspection, as you know the staff at Myrtle Beach Safari runs tours for guests several days during the week. As pre-licensing inspections are scheduled events on mutually agreeable dates, Ms. York has communicated that the inspection should occur on a day that the staff is not occupied with duties related to the tours. Given the nature of the inspection, we want to make sure that the inspectors have the full attention of Ms. York and the staff and can answer questions as needed about the animals in their care. We would appreciate it if the USDA would work with us to schedule a Monday, Wednesday or Friday pre-license inspection.

Please do not hesitate to contact me with any questions relating to the license application.

Very truly yours,

/s/ Michelle C. Pardo

cc: Dr. Carla Thomas (via email)